## Exhibit A

**Proposed Order** 

19-23649-shl Doc 2426-1 Filed 02/26/21 Entered 02/26/21 16:47:59 Exhibit A - Proposed Order Pg 2 of 4

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., et al.,

Debtors.1

**Chapter 11** 

Case No. 19-23649 (RDD)

(Jointly Administered)

## PROPOSED ORDER SHORTENING NOTICE WITH RESPECT TO MOTION OF DEBTORS FOR ENTRY OF A FIFTH ORDER EXTENDING THE EXCLUSIVE PERIOD WITHIN WHICH TO FILE A CHAPTER 11 PLAN

Upon the motion (the "Motion")<sup>2</sup> of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the "Debtors") for entry of an order (this "Order") shortening the notice period with respect to the Exclusivity Motion, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of

\_

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>&</sup>lt;sup>2</sup> Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

19-23649-shl Doc 2426-1 Filed 02/26/21 Entered 02/26/21 16:47:59 Exhibit A - Proposed Order Pg 3 of 4

the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief requested is in the best interests of the Debtors, their estates, creditors and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

## IT IS HEREBY ORDERED THAT

- 1. The relief requested in the Motion is hereby granted as set forth herein.
- 2. Notice of the Exclusivity Motion as provided therein shall be deemed good and sufficient notice of such Exclusivity Motion.
- 3. A hearing (the "Hearing") to consider the relief requested in the Exclusivity Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, New York 10601 on March 1, 2021, at 9:00 a.m. (Prevailing Eastern Time).
- 4. The responses or objections to the Exclusivity Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures* entered on November 18, 2019 [ECF No. 498] (the "Case Management Order"), and shall be filed with the Court (a) by registered users of the Court's case filing system, electronically in accordance with General Order M–399 (which can be found at <a href="http://www.nysb.uscourts.gov">http://www.nysb.uscourts.gov</a>), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers as set forth in the Case Management Order), in

19-23649-shl Doc 2426-1 Filed 02/26/21 Entered 02/26/21 16:47:59 Exhibit A - Proposed Order Pg 4 of 4

accordance with the customary practices of the Court and General Order M-399, to the extent

applicable, and served so as to be actually received no later than March 1, 2021, at 9:00 a.m.

(Prevailing Eastern Time)—on the Master Service List (as defined in the Case Management

Order).

5. The Debtors are authorized to take all such actions as are necessary or appropriate

to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from

or related to the implementation, interpretation, and enforcement of this Order.

White P	lains, New	York
Dated:		, 2021

THE HONORABLE ROBERT D. DRAIN UNITED STATES BANKRUPTCY JUDGE